



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UAW LOCAL 2179, et al

CV 08-8483 (NRB)

Plaintiff,  
-against-

CEP CONSULTANTS, CFM ADVISORS,  
INC. and LOU RUSSO,

**JOINT PROPOSED CASE  
MANAGEMENT AND  
SCHEDULING ORDER**

Defendants.

The Plaintiffs, UAW LOCAL 2179 PENSION PLAN, MICHAEL KELLOGG, PABLO VALCARCEL, ROBERT MADORE, as Trustees of the UAW LOCAL 2179 PENSION PLAN and the Defendants, CEP CONSULTANTS, CFM ADVISORS, INC. and LOU RUSSO, the parties in the within action, as and for their proposed discovery plan pursuant to Rule 26 (f)(1)-(4), hereby propose the following:

1. Deadline for completion of initial disclosures required by Rule 26(a):	May 29, 2009
2. First request for production of documents and first request for interrogatories due by:	<i>May</i> June 30, 2009 <i>MLRS</i>
3. Deadline for joinder of additional parties and amendment of pleadings:	May 29, 2009
4. Status Conference:	As directed by the Court
5. All discovery, including production of all expert reports, if any, to be completed by:	August 31, 2009
6. Dispositive motion process started by:	<i>October</i> November 1, 2009 <i>MLRS</i>
7. Joint pretrial order due by:	As directed by the Court
8. Pretrial Conference:	As directed by the Court

Dated: New York, New York  
May 5, 2009

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SO ORDERED: *as modified*  
May 11, 2009

Hon. Naomi Reice Buchwald  
HON. NAOMI REICE BUCHWALD  
United States District Court Judge